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*Attorneys for the State of Nevada ex rel.  
the Nevada Division of Forestry,  
and Kacey KC, an individual*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LUIS SANDOVAL, an individual,

Plaintiff,

vs.

STATE OF NEVADA *ex rel.* NEVADA  
DEPARTMENT OF CORRECTIONS, a State of  
Nevada agency; STATE OF NEVADA *ex rel.*  
THE STATE OF NEVADA, DIVISION OF  
FORESTRY, a State of Nevada agency; JEREMY  
BEAN, an individual; RONALD OLIVER, an  
individual; KACEY KC, an individual;  
KIMBERLY MCCOY, an individual; GILLIAN  
LAMBEY, an individual; MARK GALVEZ  
MARTINEZ, an individual; PATRICIO  
CORDERO, an individual; EDGAR  
DESANTIAGO, an individual; KENNETH  
WILLIAMS, an individual; DOE UTILIZATION  
REVIEW COMMITTEE MEMBERS, individuals;  
DOE CHIEF OF NURSING SERVICES, and  
individual; DOE DIRECTORS OF NURSING,  
individuals; JUSTIN MCROBERTS, an  
individual; DOE CHARGE NURSES, individuals;  
DOE PHARMACISTS, individuals; DOE  
PHARMACY TECHNICIANS, individuals;  
ELBETH ALBANA, an individual; MIRIT  
AVRAM, an individual; BETTY OMANDAC, an  
individual; SYMOUR OMANDAC, an individual;  
DOE PROVIDERS 1 through 11;

Defendants.

Case No. 2:25-CV-00500-MMD-NJK

**ORDER GRANTING AMENDED  
STIPULATION AND ORDER TO  
EXTEND TIME TO FILE RESPONSIVE  
PLEADING FOR DEFENDANT STATE  
OF NEVADA EX REL. THE NEVADA  
DIVISION OF FORESTRY, AND KACEY  
KC  
(FIRST REQUEST)**

1 Plaintiff Luis Sandoval, by and through his counsel, the law firm of LAGOMARSINO LAW, and  
2 Defendants State of Nevada *ex rel.*; Nevada Division of Forestry (“NDF”) and Kacey KC, by and through  
3 their counsel, Attorney General for the State of Nevada AARON D. FORD, and Deputy Attorney General  
4 NICOLE N. TING, hereby agree and stipulate that the time to file a responsive pleading to Plaintiff’s  
5 Complaint for Defendants NDF and Kasey KC is extended until **July 3, 2025**. This is the first stipulation  
6 or request for extension of this deadline.

7 **I. FACTS**

8 Plaintiff filed his Complaint on March 17, 2025, in the United States District Court for the District  
9 of Nevada. The dates the Defendants were served with the Complaint and associated Summons, are noted  
10 below:

11 A. The Defendants filed a signed and agreed to an Acceptance of Service of the Complaint  
12 and Summons that was signed on May 22, 2025, and filed on May 22, 2025.

13 **II. STIPULATION TO EXTEND TIME TO FILE RESPONSIVE PLEADING**

14 The Acceptance of Service Defendants State of Nevada *ex rel.* Nevada Division of Forestry and  
15 Kacey KC filed on May 22, 2025, set the deadline for a responsive pleading to be filed by Defendants  
16 within 30 days of that filing. 30 days from that filing is Friday June 20, 2025.

17 Plaintiffs and Defendants hereby agree and stipulate that the time to file a responsive pleading for  
18 Defendants State of Nevada *ex rel.* Nevada Division of Forestry and Kacey KC to Plaintiffs’ Complaint  
19 is extended until **July 3, 2025**.

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**III. REASON FOR DELAY**

The reason causing the need for additional time and for missing the filing deadline for filing an extension is due to excusable neglect. Counsel for NDF and Kacey KC recently had three (3) close relatives pass away causing the need to take leave from work. This has caused the need for more time in order to prepare a response to Plaintiff's Complaint.

**IT IS SO ORDERED:**



UNITED STATES DISTRICT COURT JUDGE

DATED: June 24, 2025

Submitted By:

AARON D. FORD  
Attorney General

By: /s/ Nicole N. Ting

NICOLE N. TING, ESQ (#12289)  
Deputy Attorney General  
*Attorneys for the State of Nevada ex rel.  
the Nevada Division of Forestry, and Kacey KC, an individua*

DATED this 23rd day of June, 2025.

AARON D. FORD  
Attorney General

By: /s/ Nicole N. Ting

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the Nevada Division of Forestry, and  
Kacey KC, an individual*

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DATED this 23rd day of June, 2025.

LAGOMARSINO LAW

By: /s/ Cristina P. Valentine

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*Attorneys for Plaintiff Luis Sandoval*

1 DATED this 23<sup>rd</sup> day of June, 2025.

2 AARON D. FORD  
3 Attorney General

4 By: /s/ Rudolf M. D'Silva

5 RANDALL GILMER  
6 Chief Deputy Attorney General  
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